

FILED

OCT 26 2022

**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:22CR588-RLW/SPM
)	
SAMANTHA J. CHERRY,)	
)	
Defendant.)	

INDICTMENT

COUNT ONE

The Grand Jury charges that:

1. Beginning on or about January 1, 2021 and ending on or about March 18, 2022, in the Eastern District of Missouri, defendant

SAMANTHA J. CHERRY,

being an employee of UMB Bank, a bank whose deposits are insured by the Federal Deposit Insurance Corporation, with intent to injure and defraud, willfully embezzled the sum of approximately \$439,000.00, knowing the money belonged to, and was in the care, custody, and control of UMB Bank.

In violation of Title 18, United States Code Section 656.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 982(a)(2), upon conviction of an offense in violation of Title 18, United States Code, Section 656 as set forth in Count I, the

defendant shall forfeit to the United States of America any property constituting, or derived from, proceeds the defendant obtained directly or indirectly as a result of such violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

JENNIFER J. ROY #47203MO
Assistant United States Attorney